## Title V

## **Model General Permit Template**

## **SERIES 1 LOADING RACKS**

## Template # SJV-LR-1-0

facility which commenced construction or modification December 17, 1980

after

loading racks at facility loading greater than 20,000 gallons gasoline on any one day into tank trucks

Reid vapor pressure of any gasoline at loading greater than or equal to 4.0 psia, and

true vapor pressure of organic liquid at loading greater than or equal to 1.5 psia

This template is designed to streamline the Title V permitting process for loading racks meeting the above qualifications. Applicants for Title V permits choosing to use this template will only have to complete the enclosed template qualification form and submit it with their Title V application.

## San Joaquin Valley Unified Air Pollution Control District

# Final Title V Model General Permit Template Series 1 Loading Racks

**Template No: SJV-LR-1-0** 

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# SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

## TITLE V GENERAL PERMIT TEMPLATE SJV-LR-1-0

## **ENGINEERING EVALUATION**

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## I. Purpose

The purpose of the proposed template is to streamline the Title V permitting process and reduce the time required by the applicant and the District by identifying the federally applicable requirements for gasoline loading racks and establishing permit conditions which will ensure compliance with such requirements. These conditions will be incorporated into the Title V permit of any facility choosing to make use of the template.

## II. Template Applicability

The template applies to gasoline loading racks which:

Are used by a loading facility which loads greater than 20,000 gallons of gasoline on any one day into tank trucks, and

Are located at a facility which commenced construction, modification, or reconstruction after December 17, 1980, and

Loading any gasoline with Reid vapor greater than or equal to 4.0 psia, and

Loading any organic liquid with true vapor greater than or equal to 1.5 psia.

The applicability of this template is determined by completion of the Template Qualification Form (TQF) attached as Appendix D. The completed and signed TQF must be submitted with the Title V application.

## III. Applicable Requirements

Units may be subject to "federally enforceable " requirements as well as requirements that are enforceable by the "District-only." Federally enforceable requirements will be enforceable by the EPA, the District, and the public through Title V permit conditions identified as federally enforceable. District-only requirements represent local or state regulations for which the EPA has no direct enforcement authority. The final Title V permits issued by the District will contain both federally enforceable and District-only requirements.

District-only requirements are not addressed in this template except for those used in streamlining of multiple requirements (see discussion in section IV). District-only requirements used in streamlining of multiple requirements will become federally enforceable. Table 1, <u>Applicable Requirements</u>, does not necessarily include all federally enforceable requirements that apply to loading racks qualifying to use this

template, and it is the source's responsibility to determine any and all applicable requirements to which the source is subject. Generally, requirements not addressed by this template are those that require a source-specific analysis, or are covered by other templates.

**Table 1. Applicable Requirements** 

Rule Category	Rule/Regulation	Citation	Description
Α	County Rule	108.1 <sup>1</sup>	Source Sampling
Α	County Rule	110 <sup>2</sup>	Source Sampling
Α	County Rule	108 <sup>3</sup>	Source Sampling
Α	County Rule	412 <sup>4</sup>	Organic Liquid Loading
Α	County Rule	413 <sup>5</sup>	Organic Liquid Loading
Α	County Rule	419 <sup>6</sup>	Organic Liquid Loading
А	SJVUAPCD Reg. IV	4621, section 5.1 & 5.2 <sup>7</sup>	Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants
А	SJVUAPCD Reg. IV	4624	Organic Liquid Loading
А	NSPS Subpart XX	40CFR§60.500	Standards of Performance for Bulk Gasoline Terminals
Α	SJVUAPCD Reg. II	2520, 9.1, 9.4.2, 9.5.2, 13.2	Operational, Monitoring and Recordkeeping Requirements, and Permit Shields
В	SJVUAPCD Reg. II	2201	New Source Review Rule
В	SJVUAPCD Reg. II	2520 <sup>8</sup>	Federally Mandated Operating Permits
В	SJVUAPCD Reg. IV	4101 <sup>9</sup>	Visible Emissions
В	SJVUAPCD Reg. IV	4621, section 5.2 <sup>10</sup>	Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants
В	NESHAP Subpart R	40CFR§63.420	National Emission Standards for Gasoline Distribution Facilities
В	NESHAP Subpart CC	40CFR§63.640	National Emission Standards for Hazardous Air Pollutants From Petroleum Refineries
С	SJVUAPCD Reg. IV	4621, except sections 5.1 and 5.2	Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants
С	SJVUAPCD Reg. IV	4661	Organic Solvents
D	SJVUAPCD Reg. I	1081	Source Sampling

<sup>&</sup>lt;sup>1</sup> Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus

<sup>&</sup>lt;sup>2</sup> Madera

<sup>&</sup>lt;sup>3</sup> Kings

<sup>&</sup>lt;sup>4</sup> Fresno, Merced, San Joaquin, and Stanislaus

<sup>&</sup>lt;sup>5</sup> Kern, Kings, and Tulare

<sup>&</sup>lt;sup>6</sup> Madera

<sup>&</sup>lt;sup>7</sup> This template addresses compliance with section 5.2 of this rule only for tank trucks and trailers.

<sup>&</sup>lt;sup>8</sup> Other than Category A requirements

<sup>&</sup>lt;sup>9</sup> Portions of this rule are addressed in the facility-wide template SJV-UM-0-0.

<sup>&</sup>lt;sup>10</sup> Compliance with section 5.2 (vapor tightness) for any delivery vessel, excluding tank trucks and trailers, must be demonstrated by the source outside of this template (i.e. for railroad cars). If only tank trucks and trailers are used for delivery, the source must propose a condition on their source specific Title V application stating such.

Category "A" rules contain requirements that are directly applicable to the qualifying units; compliance with these applicable requirements will be demonstrated in this engineering evaluation and assured by the template permit conditions. In section IV, <a href="Compliance">Compliance</a>, the federally-enforceable requirements from category "A" rules are listed with a discussion of how compliance with these requirements is achieved.

Category "B" rules contain federally enforceable requirements (aside from those listed as Category A) that were not addressed in this template. These may not be all of the federally enforceable requirements for this unit. Requirements from these rules must be addressed by the applicant outside of this template within the Title V application Compliance Plan form (TVFORM-004). Category "B" listing is included in this table as an informational item to assist applicants in this effort.

Category "C" rules contain requirements which have been determined not to be applicable to qualifying units. A permit shield is proposed for the category "C" rules. An explanation of the determination of non-applicability of Category "C" rules is included in section V, Permit Shield.

Category "D" rules are District rules which are used to show compliance with federally enforceable requirements and therefore some requirements from these rules will become federally enforceable through the use of this template.

## **IV.** Compliance

This section contains a discussion of how compliance is assured with each requirement addressed in this template.

## District Rule 1081 and County Rules 108, 108.1, and 110

District Rule 1081 has been submitted to the EPA to replace each of the county rules in the SIP: Rule 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern and Stanislaus), and 110 (Madera). Appendix B lists all of the applicable requirements of District Rule 1081 and shows which are included in the rule from each county. This table shows that District Rule 1081 is more stringent than each of these county rules.

Sections 3.0, 4.0, 5.0, 6.0, and 7.0 of Rule 1081 set forth requirements for sampling facilities, collection of samples, test methods, test procedures, and administrative requirements, respectively. These requirements are covered by template permit condition #1.

# <u>40 CFR 60 Subpart XX, District Rules 4621, sections 5.1 and 5.2, and 4624 (formerly 463.3), and County Rules 412, 413, and 419</u>

This template is designed for gasoline loading facilities which are also Class 1 Organic Liquid Loading Facilities, as defined in District Rule 4624 and subject to District Rules 4621, sections 5.1 & 5.2, and 4624; and 40 CFR 60, Subpart XX. Loading racks

qualifying to use this template may also be used to load organic liquids, other than gasoline, which are subject to District Rule 4624. Pursuant to District Rule 4624, a Class 1 Organic Liquid Loading Facility is any facility loading 20,000 gallons or more on any one day of organic liquids (including gasoline) with a TVP of 1.5 psia or greater into tank trucks, trailers, or railroad tank cars. District Rule 4624, formerly District Rule 463.3, has been submitted to the EPA to replace each of the county rules in the SIP: Rules 412 (Fresno, Kings, Stanislaus, Merced, and San Joaquin), 413 (Kern and Tulare), and 419 (Madera).

District Rule 4621, sections 5.1 and 5.2, is applicable to gasoline delivery vessels with capacity greater than 120 gallons and contains general facility requirements regarding transfer to and storage of gasoline in stationary storage tanks.

Subpart XX is applicable to bulk gasoline terminals capable of loading greater than 20,000 gallons per day of gasoline, having a Reid vapor pressure of 4.0 or greater, into tank trucks.

These rules and regulations establish volatile organic compound (VOC) emission limits and work practice standards for gasoline loading facilities. The following analysis shows that the VOC emission requirements of District Rule 4624 are more stringent than the emission requirements of 40 CFR Subpart 60 and the county rules. Streamlining procedures, in accordance with White Paper Number 2 and as documented in the following steps, are utilized to substitute the proposed set of requirements for the otherwise applicable requirements.

**Step 1. Side-by-side Comparison of Applicable Requirements:** 

				VOC				
CITATION:	District Rule 4624	County Rules 412, (Merced, Stanislaus), 413 (Kern, Tulare), and 419 (Madera)	San Joaquin County Rule 412	Fresno County Rule 412	Kings County Rules 412	District Rule 4621, 5.1 and 5.2	Subpart XX	Proposed Requirements
WORK PRACTICE STANDARDS SUPPORTING EMISSION LIMIT (E.L.)	•Delivery tanks which previously contained organic liquids with a TVP greater than 1.5 psia at loading conditions shall be filled only at loading facilities satisfying Sections 5.1 and 5.2. [4624, 5.3]     •Facility shall be equipped with bottom loading and a vapor-collection-and-control system. [4624, 5.1.1]     •Operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [4624, 5.2]	Loading facility equipped with vapor collection and disposal system. [412, 413, 419]	Loading facility equipped with vapor collection and disposal system. [412(a)(1)]	Loading facility equipped with vapor collection and disposal system. [412(C)(1)]	•Any gasoline delivery vessel into which gasoline vapors have been transferred shall be filled only at a facility with system preventing at least 95% of vapors displaced from entering atmosphere. [412(4)(a)]	Any gasoline delivery vessel into which gasoline vapors have been transferred shall be filled only at a facility with system preventing at least 95% of vapors displaced from entering atmosphere. [4621, 5.2.2]	●Be equipped with a vapor collection system designed to collect the total organic compounds vapor displaced from tank trucks during product loading. [§60.502(a)] •Vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. [§60.502(d) •Vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 450 mm of water at which level the pressure vacuum vent shall be set. [§60.502(h) &(l)]	Delivery tanks which previously contained organic liquids, including gasoline, with a TVP greater than 1.5 psia at loading conditions shall be filled only at loading facilities satisfying Sections 5.1 and 5.2. [4624, 5.3, 4621, 5.2.2 and 412(4)(a)] Facility shall be equipped with bottom loading and a vapor collection and control system. [4624, 5.1.1] Operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [4624, 5.2]

EMISSION LIMIT	<ul> <li>VOC emissions</li> </ul>	Disposal system	•Disposal system	Disposal system	Any gasoline	Any gasoline	<ul> <li>VOC emissions</li> </ul>	•VOC emissions shall not
	shall not exceed	of displaced	will consist of one	of displaced	delivery vessel	delivery vessel into	shall not exceed	exceed 0.08 pound per
	0.08 pound per	vapors during	of the following: 1)	vapors during	into which	which gasoline	35 milligrams per	1000 gallons of organic
	1000 gallons of	loading shall	system which	loading shall	gasoline vapors	vapors have been	liter of organic	liquid loaded. [4624,
	organic liquid	consist of one of	limits emissions	consist of one of	have been	transferred shall be	liquid loaded.	5.1.1]
	loaded. [4624,	the following: 1)	to 0.6 lb VOC per	the following: 1)	transferred	filled only at a	[§60.502(b)]	
1	5.1.1]	system with 90%	1000 gallons	system with 90%	shall be filled	facility with system		
		efficiency or 2)	loaded, or 2)	efficiency or 2)	only at a facility	preventing at least		
		directs vapors to	directs vapors to	directs vapors to	with system	95% of vapors		
		fuel gas system,	fuel gas system,	fuel gas system,	preventing at	displaced from		
		or 3) with	or 3) with	or 3) with	least 95% of	entering		
		efficiency as great	efficiency as great	efficiency as great	vapors	atmosphere. [4621,		
		as 1 or 2. [412,	as 1 or 2.	as 1 or 2.	displaced from	5.2.2]		
		413, 419]	[412(a)(3)]	[412(C)(1)]	entering			
					atmosphere.			
1					[412(4)(a)]			

BRACTICE SIAMDARD NOT - Lauding and vapor collection suppression from SUPPORTING EL.  ### Author of the prevent liquid drainage in excess of 10 ml per disconnect in excess of 10 ml per disconnect. See the performed during the periodic disconnection of the periodic d	WORK	1	T	N. 1.12	I	l	T		
STANDARD NOT SUPPORTING E.L. I alken to equipment a mintained such that there are no liquid leaks in excess of 3 mintained such that there are no liquid leaks in excess of 3 dropsim or vapor leaks of such as a device, [412, 413, 419] and the such that there are no liquid leaks in excess of 3 dropsim or vapor leaks of such as a device, [412, 413, 419] and the such as a device, [412, 413, 419] and the such as a device, [412, 413, 419] and the such as a device, [412, 413, 419] and the such as a device, [412, 413, 419] and the such as a device, [412, 413, 419] and the such as a device, [412, 413, 419] and the such as a device, [412, 413, 419] and the such as a device, [412, 413, 419] and the are are no liquid leaks in excess of 10 ml per average of 3 consecutive disconnects.  412(a)(a)(a)(a)(a)(a)(a)(a)(a)(a)(a)(a)(a)(	WORK		Measures	No delivery	No liquid	<ul> <li>None</li> </ul>	No gasoline	<ul> <li>Monthly liquid and</li> </ul>	•Loading and vapor
per disconnect maintained such that there are no liquid least, excess of 3 and drops/min or vapor leaks in excess of 10,000 ppm, 14024, 5.3]  **Loading device maintained to prevent liquid drainage in excess of 10 ml per average of 3 consecutive maintained to prevent liquid drainage in excess of 10 ml per average of 3 consecutive disconnects, [412(b)(2)]  **Per average of 3 consecutive disconnects of any top loading facility shall not be slowed, [4624, 5.5]  **Per average of 3 consecutive disconnects of any top loading facility shall not be slowed, [4624, 5.5]  **Per average of 3 consecutive disconnects of any top loading facility shall not be allowed with the placed in any short experisor of any top loading facility shall not be allowed. [4624, 5.5]  **Per average of 3 consecutive disconnects of any top loading facility shall not be allowed. [4624, 5.5]  **Per average of 3 consecutive disconnects. [412(b)(2)]  **Per average of 3 consecutive disconnects. [412(b)(4)]  **Per average of 3 consecutive disconne		J		•	•		,		
ELL maintained such that there are no filiquid leaks in excess of 3 all drogamin or experience of the prevent liquid prevent liquid drainage in excess of 10,000 prevent liquid drainage in excess of 10 ml per average of 3 consecutive disconnects.  [4824, 5.5]  412(a)(2)]  412(a)(2)]	STANDARD NOT	vapor collection	taken to	loaded unless	excess of 10 ml		be operated or	inspections to be	be designed and operated
that there are no liquid leaks in oxcess of 3 drops/min or vapor leaks in excess of 10 cools pp. (432, 45.4) 4, 19) 4, 19, 19, 19, 19, 19, 19, 19, 19, 19, 19	SUPPORTING	equipment	prevent liquid	vessel is vapor	per disconnect		loaded unless valid	performed during	such that there are no
that there are no liquid leaks in a cocess of 3 drops/min or vapor leaks in excess of 10 mo ppm, [4624, 5.4] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19] 4,19]	E.L.	maintained such	drainage	tight, per ARB	per average of 3		State of California	loading. Each leak	leaks. (leaks as defined in
device, [412, 413, 419]		that there are no	from loading	certification and			decals, as required	shall be repaired	rule). [4624, 5.4]
excess of 3 drops/min or vapor leaks in excess of 10,000 ppm, 14624, 5.3]  **Loading device maintained to prevent liquid drainage in excess of 10 ml per average of 3 consecutive disconnects. [412(c)(2)]  **Editorial construction, or expansion of any top loading facility shall not be allowed. [4624, 5.5]  **Loading device maintained to prevent liquid drainage in excess of 10 ml per average of 3 consecutive disconnects. [412(c)(2)]  **Loading device maintained to prevent liquid drainage in excess of 10 ml per average of 3 consecutive disconnects. [412(c)(2)]  **Loading device maintained to prevent liquid drainage in excess of 10 ml per average of 3 consecutive disconnects. [412(c)(2)]  **Loading device maintained to prevent liquid drainage in excess of 10 ml per average of 3 consecutive disconnects. [412(c)(2)]  **Loading device maintained to prevent liquid drainage in excess of 10 ml per average of 3 consecutive disconnects. [412(c)(2)]  **Loading device maintained to prevent liquid drainage in excess of 10 ml per average of 3 consecutive disconnects. [412(c)(2)]  **Loading device maintained to prevent liquid drainage in excess of 10 ml per average of 3 consecutive disconnects. [412(c)(2)]  **Loading device maintained to prevent liquid drainage in excess of 10 ml per average of 3 consecutive disconnects. [412(c)(2)]  **Loading device maintained to prevent liquid drainage in excess of 10 ml per average of 3 consecutive disconnects. [412(c)(2)]  **Loading device maintained to prevent liquid drainage in excess of 10 ml per average of 3 consecutive disconnects. [412(c)(2)]  **Loading device maintained to prevent liquid drainage in excess of 10 ml per average or 3 consecutive disconnects. [412(c)(2)]  **Loading device maintained to prevent liquid drainage in excess of 10 ml per average or 3 consecutive disconnects. [412(c)(2)]  **Loading device maintained to prevent liquid drainage in excess of 10 ml per average or 3 consecutive disconnects. [412(c)(2)]  **Loading device maintained to prevent liquid drainage in exces			•					•	,
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excess of 1 0,000 ppm, [4624, 5.3] •Loading device maintained to per average of 3 consecutive disconnects. [412(C)(42)] •Rew facilities shall be excess of 10 ml per average of 3 consecutive disconnects. [412(C)(2)] •Alter facilities shall be exconstructed with disconnects. [4624, 5.4] •Construction, or expansion of any top loading facility shall not be allowed. [4624, 5.5] •Alter facility shal				•			,		, ,
ppm. [4624, 5.3]  *Loading device maintained to prevent liquid drainage in excess of 10 ml per average of 3 consecutive disconnects. [412(a)(2)]  *All **Loading beine excess of 10 ml per average of 3 consecutive disconnects. [412(a)(2)]  *All **Loading beine excess of 10 ml per average of 3 consecutive disconnects. [412(a)(2)]  *All **Loading beine excess of 10 ml per average of 3 consecutive disconnects. [412(a)(2)]  *All **Loading beine excess of 10 ml per average of 3 consecutive disconnects. [412(a)(2)]  *All **Loading beine excess of 10 ml per average of 3 consecutive disconnects. [412(a)(2)]  *All **Loading beine excess of 10 ml per average of 3 consecutive disconnects. [412(a)(2)]  *All **Loading beine excess of 10 ml per average of 3 consecutive disconnects. [412(a)(2)]  *All **Loading beine excess of 10 ml per average of 3 consecutive disconnects. [412(a)(2)]  *All **Loading beine excess of 10 ml per average of 3 consecutive disconnects. [412(a)(2)]  *All **Loading beine excess of 10 ml per average of 3 consecutive disconnects. [412(a)(a)]  *All **Loading beine excess of 10 ml per average of 3 consecutive disconnects. [412(a)(a)]  *All **Loading beine excess of 10 ml per average of 3 consecutive disconnects. [412(a)(a)]  *All **Loading beine excess of 10 ml per average of 3 consecutive disconnects. [412(a)(a)]  *All **Loading beine excess of 10 ml per average of 3 consecutive disconnects. [412(a)(a)(a)]  *All **Loading beine excess of 10 ml per average of 3 consecutive disconnects. [412(a)(a)(a)(a)(a)(a)(a)(a)(a)(a)(a)(a)(a)(		•							`
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per average of 3 consecutive disconnects. [4624, 5.4]  - Construction, reconstruction, or expansion of any top loading facility shall not be allowed. [4624, 5.5]  - (4624, 5.5]  - (4624, 5.5]  - (4624, 5.5]  - (4624, 5.5]  - (4624, 5.5]  - (4624, 5.5]  - (4624, 5.5]  - (4624, 5.5]  - (4624, 5.5]  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624,		drainage in		disconnects.	bottom loading		unless vessel is	facility.	<ul> <li>No gasoline delivery</li> </ul>
per average of 3 consecutive disconnects. [4624, 5.4]  - Construction, reconstruction, or expansion of any top loading facility shall not be allowed. [4624, 5.5]  - (4624, 5.5]  - (4624, 5.5]  - (4624, 5.5]  - (4624, 5.5]  - (4624, 5.5]  - (4624, 5.5]  - (4624, 5.5]  - (4624, 5.5]  - (4624, 5.5]  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624, 5.5)  - (4624,		excess of 10 ml		[412(a)(2)]	systems.		vapor tight. [4621,	[60.502(e)(1)]	vessel shall be operated
onsecutive disconnects.  [4624, 5.4] •Construction, reconstruction, or expansion of any top loading facility shall not be allowed. [4624, 5.5]  [4624, 5.5]  *The transfer of gasoline from any delivery vessel to any stationary storage container with 250 gallon capacity or more shall not be allowed. [4624, 5.5]  [4624, 5.5]  *The transfer of gasoline from any delivery vessel to any stationary storage container with 250 gallon capacity or more unless it sequipped with a permanent submerged fill pipe and an ARB certified Phase I vapor recovery system. [4621, 5.1.1]  *No gasoline shall be placed in any above-ground tank of 250 gallon capacity or more unless it sequipped with pressure-vacuum valve. [4621, 5.1.2]  *No gasoline shall not be allowed. [4624, 5.5]  *The transfer of gasoline from any delivery vessel to any stationary of the tank ID number with valor tightness documentation file within 2 weeks, and take steps to assure nonvapor-recovery system. [4621, 5.1.1]  *No gasoline shall not be allowed. [4624, 5.5]  *The transfer of gasoline from any delivery vessel to any stationary valve. [4624, 5.5]  *The transfer of gasoline from any delivery vessel to any stationary valve. [4624, 5.5]  *The transfer of gasoline from any delivery vessel to any stationary valve. [4624, 5.5]  *The transfer of gasoline from any delivery vessel to any stationary valve. [4624, 5.5]  *The transfer of gasoline from any delivery vessel to any stationary vessel operated or loaded than transfer of the permanent submerged fill pipe and any stationary storage container with 250 gallon capacity or more unless it sequipped with a permanent submerged fill pipe and an ARB certified Phase I vapor recovery system. [4621, 5.1.2]  *No gasoline shall be placed in any above-ground gasol		per average of 3		- , , , , , , , , , , , , , , , , , , ,	-				
disconnects. [4624, 5.4]  Construction, reconstruction, or expansion of any top loading facility shall not be allowed. [4624, 5.5]  When the fact of t		consecutive						record the tank ID	State of California decals.
delivery vessel to any stationary stronge container with 250 gallon capacity or more shall not be allowed. [4624, 5.5]  delivery vessel to any stationary storage container with 250 gallon capacity or more shall not be allowed. [4624, 5.5]  delivery vessel to any stationary storage container with 250 gallon capacity or more unless container is equipped with a permanent submerged fill pipe and an ARB certified Phase I vapor recovery system. [4621, 5.1.1]  No gasoline shall be placed in any above-ground tank of 250 gallon capacity or more unless it is equipped with pressure-vacuum valve. [4621, 5.1.2]									-
*Construction, or expansion of any top loading facility shall not be allowed. [4624, 5.5]  [4624, 5.5]  **Recovery system.**  [4621, 5.1.1]  **No gasoline shall with a permanent submerged fill pipe and an ARB certified Phase I vapor recovery system. [4621, 5.1.1]  **No gasoline shall be placed in any above-ground tank of 250 gallon capacity or more unless it is equipped with pressure-vacuum valve. [4621, 5.1.2]  **No gasoline shall not be allowed.**  [4621, 5.1.2]  **No gasoline shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not placed in any above-ground tank of 250 gallon capacity or more unless it is equipped with pressure-vacuum valve. [4621, 5.1.2]  **No gasoline shall be placed in any above-ground tank of 250 gallon capacity or more shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision of any top loading facility shall not be allowed.**  **Provision o							,		ů .
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MONITORING	•None	•None	•None	•None	•None	•None	•Monthly leak inspection. [§60.502(j)]	Perform annual VOC emission test. [2520, 9.4.2] Perform annual vapor collection and control system pressure tests. [2520, 9.4.2] Perform monthly leak inspection and drainage inspection. Change to quarterly drainage inspections under certain conditions [2520, 9.4.2 and §60.502(j)]
RECORDKEEPING	Maintain all records for a period of not less than two years. [4624, 6.1]	•None	•None	•None	•None	•None	•Tank truck vapor tightness per §60.502(e)(1) on file in a permanent form. [§60.505(a)] •Tank truck pressure test updates to file each year. [§60.505(b)] •Monthly leak inspection records maintained for two years. [§60.505(c) •Non-vapor-tight truck notifications maintained for 2 years. [§60.505(d)] •Records of replacements or additions of components maintained for 3 years. [§60.505(f)]	Maintain all records for a period of not less than five years. [2520, 9.5.2]
REPORTING	<ul><li>None</li></ul>	<ul><li>None</li></ul>	<ul><li>None</li></ul>	<ul> <li>None</li> </ul>	<ul><li>None</li></ul>	<ul> <li>None</li> </ul>	<ul><li>None</li></ul>	<ul><li>None</li></ul>

TEST METHODS	Leak detection	•None	•None	Vapor and	•None	Tank Truck vapor	•Leak detection	Halogenated exempt
IEST METHODS	with portable	•INOTIE	•INOTIE	Liquid leak	•INOTIE	tightness verified by	by EPA Method	compounds by ARB
	hydrocarbon			detection using		EPA Method 27.	21. [§60.503(b)]	Method 432. [4624,
	detection			CARB test		[4621, 6.2.3]	•VOC emissions	6.2.1]
	instrument			procedure with		• Vapor recovery	by EPA Method	•VOC emissions by
	calibrated with			gas detector		compliance using	25A or 25B and	using 40CFR§60.503 and
	methane (i.e.			[412(C)(4)]		ARB Method 202	volume of air-vapor	EPA Reference Methods
	similar to EPA			[412(0)(4)]		[4621, 6.2.1]	mixture by EPA	2A, 2B, 25A and 25B
	Method 21)					[4021, 0.2.1]	method 2A or 2B	and ARB Method 432, or
	[4624, 3.6]						at intervals and as	ARB Method 2-4. [4624,
	•Halogenated						averaged per	6.2.2]
	exempt						40CFR§60.503(c).	•Leak detection by EPA
	compounds by						• Tank Truck	Method 21. [§60.503(b)]
	ARB Method						vapor tightness	Tank Truck vapor
	432.						verified by EPA	tightness verified by EPA
	[4624, 6.2.1]						Method 27.	Method 27. [4621, 6.2.3
	•VOC						[40CFR§60.503(c)	and 40CFR§60.503(c)]
	emissions by						]	
	using						•	
	40CFR§60.503							
	and EPA							
	Reference							
	Methods 2A,							
	2B, 25A and							
	25B and ARB							
	Method 432, or							
	ARB Method 2-							
	4. [4624, 6.2.2]							

### Step 2. Select most stringent emission limit and/or performance standard:

#### **VOC Emission Limits**

1) Mass VOC/volume Loaded Limit: The proposed TOC emission limit of 0.08 pound VOC/1000 gallons of organic liquid loaded is at least as stringent and expected to be the same limit allowed by District Rule 4624 for all source operations using this template. It is more stringent than the mass limits allowed by District Rule 4621 and the county rules<sup>11</sup>, as indicated in the side-by-side comparison in Step 1. The following analysis shows the proposed limit is also more stringent than 40CFR§60.502(b) which limits emission of total organic compounds (TOCs) to less than 35 mg/L of gasoline loaded. The District definition of VOCs exempts certain TOCs from being included. However, according to the ARB Speciation Manual, 12 for Bulk Gasoline Storage and Transfer, (Profile Code 710, a composite of product-summer blend) there are no exempt compounds in gasoline vapors. CARB has also published a list of ratios of reactive organic compounds to total organic compounds for specific types of operations according to Source Classification Code (SCC). These ratios indicate gasoline vapors from gasoline marketing/loading are composed of 100% reactive or unexempt compounds (note natural gas and liquid petroleum gas loading racks are excluded in the TQF). Therefore for gasoline vapors, TOG composition equals VOC composition. The following calculation converts the CFR emission limit to similar units of measure for comparison to the District Rule 4624 limit:

$$\left(\frac{1 \ part \ VOC}{1 \ part \ TOC}\right) \left(\frac{35 mg \ TOC}{L \ organic \ liquid}\right) \left(\frac{3785.4 \ L}{1000 \ gal}\right) \left(\frac{g}{1000 mg}\right) \left(\frac{1 lb}{453.59 \ g}\right) = \frac{0.29 \ lb \ VOC}{1000 \ gal \ organic \ liquid}$$

The District Rule 4624 VOC emission limit of 0.08 pound per 1000 gallons of organic liquid loaded is clearly more stringent than the mass VOC emission limit from 40CFR§60.502(b) for gasoline terminals calculated above. The proposed emission limit of 0.08 pound per 1000 gallons will insure the assumption that VOC is equal to TOC for these operations is valid and assures compliance with these requirements.

2) Emission Limit Expressed as Control Efficiency: County rules 412 (Merced and Stanislaus), 413 (Kern and Tulare), and 419 (Madera) require a control device capable of 90% <sup>13</sup> efficiency. Fresno county rule 412 requires a collection and control device with at least 90% efficiency for vapors displaced during loading. The 90% collection and control requirement is more stringent than the other county rules referenced here since it requires at least 90% efficiency for collection and control. District Rule 4621 and Kings county rule 412 require any delivery vessel which previously contained

<sup>&</sup>lt;sup>11</sup> San Joaquin and Kings counties allow several options for control of displaced VOC during loading. The District has chosen only to examine the 0.6 lb mass limit option allowed by these rules for comparison.

<sup>&</sup>lt;sup>12</sup> State of California Air Resources Board. August 1991. <u>Identification of Volatile Organic Compound Species</u> Profiles. Vol. 1: ARB Speciation Manual. Second Ed. Sacramento, California.

Merced, Fresno, Stanislaus, Kern, Tulare, and Madera counties allow several options for control of displaced VOC during loading. The District has chosen only to examine the control efficiency limit option allowed by these rules for comparison.

gasoline vapors to be filled only at a loading facility equipped with a system that has 95% collection and control. This requirement is not necessarily more stringent than the 90% requirement, since it applies only to systems which are used to fill tanks which previously held gasoline. However, the proposed emission limit requirement of 0.08 lb TOC/1000 gallons loaded is more stringent than both the 90% and 95% control efficiency requirements, as demonstrated below:

90% Efficiency for Vapors Displaced:

$$LL = 12.46 \left( \frac{SPM}{T} \right) \left( 1 - \frac{eff}{100} \right)$$

#### where:

L<sub>L</sub> = Loading losses from tank truck, pounds per 1000 gallons loaded (AP-42, 5.2, equation (1)

S = 0.5, worst case saturation factor from AP-42 table 5.2-1

P = 2.3, true vapor pressure of gasoline, worst case from AP-42, Table 7.1-2 and using Reid vapor pressure of 7 psia (from AP-42, 5.2), as worst case for gasoline at 40°F

M = 68 = molecular weight of gasoline vapors, from AP-42 table 7.1-2

 $T = 40^{\circ}F = 500^{\circ}R$ , worst case temperature of fluid during loading conditions

eff = 90%, overall reduction efficiency

Minimizing the numerator in SPM/T and maximizing the denominator will result in the worst case values (i.e. lowest emissions) for variables in the above equation. This will occur with the lowest saturation factor for loading clean cargo tank and lowest temperature loading temperature expected which results in the lowest true vapor pressure expected  $^{14}$ . Loading losses for gasoline collection and control systems with 90% efficiency are calculated to be 1.9 lb VOC/1000 gallons loaded. AP-42 states this equation is approximate with a probable error of  $\pm$  30%. Assuming this calculation is 30% high, at best, emissions are not expected to be less than 1.36 lb VOC/1000 gallons with 90% control. This value is 17 times greater than that allowed by the proposed emission limit of 0.08 lb TOC/1000 gallons loaded. Therefore, the proposed limit is more stringent and assures compliance.

95% Efficiency for Vapors In Tanks Which Previously Held Gasoline: The same equation above is used to determine loading loss, however the saturation factor, S is equal to 1.0 for dedicated vapor balance service (i.e. gasoline vapors transferred into tank during unloading). With 95% control and assuming 30% error in the equation, the minimum loading loss is not expected to be less than 0.14 lb VOC/1000 gallons. This value is approximately 2 times greater than that allowed by the proposed emission limit of 0.08 lb TOC/1000 gallons loaded. The proposed limit is more stringent and assures compliance when tanks containing gasoline vapors are loaded by any unit using this template. However this general source requirement is necessary to prevent loading of any such tank using other racks which do not meet these requirements. This standard for loading into gasoline delivery vessels has been combined with the similar work

<sup>14</sup> Higher temperatures require a higher TVP to be used in the equation. The combination of lowest loading temperature and associated TVP at this temperature does result in the lowest factor for use in this equation. See AP-42, Table 7.1-2.

practice standard for organic liquid delivery vessels from District Rule 4624, section 5.3. The proposed standard is more stringent for loading gasoline at Class 1 facilities, as proven above, and as stringent for Class 2 facilities.

## Work Practice Standards Not Supporting An Emissions Limit

The proposed work practice standards not in support of an emission limit consist of the following:

- 1. Loading and vapor collection shall be designed and operated such that there are no leaks and no excess organic liquid drainage at disconnections (leaks and excess drainage as defined in Rule 4624).
- 2. Each leak shall be repaired within 15 days of detection.
- 3. No gasoline delivery vessel shall be operated or loaded unless valid State of California decals, attesting to the vapor integrity of the tank, are displayed on the cargo tank.
- 4. No gasoline delivery vessel shall be used or operated unless it is vapor tight.
- 5. Construction, reconstruction, or expansion of any top loading facility shall not be allowed.
- 6. The transfer of gasoline from any delivery vessel to any stationary storage container with 250 gallon capacity or more shall not be allowed unless container is equipped with a permanent submerged fill pipe and an ARB certified Phase I vapor recovery system.
- 7. No gasoline shall be placed in any above-ground tank of 250 gallon capacity or more unless it is equipped with pressure-vacuum valve.

These proposed work practice standards are more stringent than those of 40CFR 60 Subpart XX and the county rules as demonstrated below.

District Rule 4621: This rule has 4 work practice standards not in support of an emissions limit. These work practice standards are included in the proposed standards. Therefore the proposed standards are as stringent as District Rule 4621.

District Rule 4624: This rule has 3 work practice standards not in support of an emissions limit. Two of the work practice standards address leaks and liquid drainage. The proposed conditions are identical to the leak and drainage requirements of this rule. The third standard prohibits the source from constructing, reconstructing, or expanding any top loading facility. This general source requirement is included as a template condition to assure compliance with the rule. The proposed work practice standards are as stringent as District Rule 4624.

County Rules 412 (Fresno, Kings, Stanislaus, Merced, and San Joaquin), 413 (Kern and Tulare), and 419 (Madera): These rules, combined, contain 5 work practice standards not in support of an emissions limit. Four of the standards address leaks and liquid drainage. The proposed standards requiring no leaks in the loading and vapor collection system (vapor detected in excess of 10,000 ppm and liquid in excess of 3 drops/minute) and no leaks in excess of 10 mls at disconnection are as stringent or more stringent than those required by the county rules, as shown in the Step 1 comparison table. The fourth county standard prohibits loading into delivery vessels unless they have valid State of California decals which attest to the vapor integrity of the tank, pursuant to California Air Resources Board (CARB) procedures. The proposed standard prohibits operation or loading of a gasoline delivery vessel unless valid State of California decals are displayed. Section 41962 of the California Health and Safety Code gives authority to CARB to establish performance standards and test procedures to be performed annually for gasoline cargo tanks. The California Code of Regulations, Title 17, subchapter 8, Article 1, section 94004, Certification of Vapor Recovery Systems - Gasoline Cargo Tanks, refers to the CARB's "Certification and Test Procedures for Vapor Recovery Systems of Gasoline Cargo Tanks". This CARB publication contains the applicable test procedures and performance standards, which are described in this template (specifically CP-204, TP-204.1, TP-204.2). CP-204 contains the performance standards and other certification requirements. TP-204.1 is a 5-minute pressure-vacuum decay test, which is similar to EPA Method 27. Annual internal vapor valve testing is also required. Tanks which pass this annual test are issued a state decal which is nonremovable and must be displayed on the cargo tank. The state also randomly monitors cargo tanks at gasoline loading facilities using either a hydrocarbon detection method or a 1-minute pressure decay test (TP-204.2), to assist in assuring tank integrity is maintained throughout the year. Cargo tanks unable to pass these spot tests are removed from service until repaired and able to pass required vapor integrity tests. The state decals are nontransferable and nonremovable and verify the delivery tank has been certified using ARB procedures. This proposed work practice standard is as stringent as the requirements of the combined county rules.

40 CFR 60, Subsection XX: This regulation contains work practice standards requiring cross checking of gasoline tank truck ID numbers with vapor tightness documentation files within 2 weeks of loading. It also requires that steps be taken to assure nonvapor tight tanks are not reloaded at the facility, though it does not specify what these steps are. The proposed standards prohibit operation or loading of a gasoline delivery vessel unless valid State of California decals are displayed.

As discussed above under compliance with County Rules 412, the State of California has strict requirements regarding gasoline cargo tanks, as specified in CARB's "Certification and Test Procedures for Vapor Recovery Systems of Gasoline Cargo Tanks". It requires annual tank pressure-vacuum decay and internal vapor valve testing, which are more stringent than the requirements of 40 CFR 60, Subsection XX. To pass this test, tanks cannot lose more than 1/2 to 1.25 inches of pressure in 5 minutes, depending on the size of the cargo tank container. This is at least twice as strict as federal requirements (3.0 inches for any size tank). Tanks which pass this

annual test are issued a state decal which must be displayed on the cargo tank. The state also randomly monitors cargo tanks at gasoline loading facilities using either a hydrocarbon detection method, as reliable as EPA Method 21, or a 1-minute pressure decay test to assist in assuring tank integrity is maintained throughout the year. Tank trucks unable to pass these spot tests are removed from service until repaired and able to pass required vapor integrity tests. This is more stringent than the requirements of 40 CFR 60, Subsection XX concerning tank vapor integrity. In addition, State decals are nontransferable and nonremovable and verify the delivery tank has been certified using ARB procedures and is vapor tight. The proposed standard is also more stringent than the work practice standards of 40 CFR 60, Subsection XX, since facilities can immediately determine if a tank has been certified/documented vapor tight and not load any truck without such certification, as verified by the state decal. Additional monitoring, recordkeeping and reporting concerning tank truck vapor tightness is unnecessary for gasoline tank trucks.

Subsection XX also requires monthly liquid and vapor leak inspections and for detected leaks to be repaired within 15 days, which are identical to the proposed monitoring and work practice standards concerning leaks.

#### Step 3. Conditions ensuring compliance with applicable requirements.

Template condition #3 requires TOC emissions from loading racks to be in compliance with 0.08 pound per 1000 gallons of organic liquid loaded. In addition, conditions have been included to meet work practice standards in support of the emission limit (conditions #3, #4, and #7) and work practice standards not in support of an emission limit (conditions #5, #6, #8, #10-12, and #15). Conditions #5, #6, and #10 are general source requirements concerning transfer and storage of gasoline in stationary storage containers and construction or modification. Condition #8 requires gasoline delivery vessels be vapor tight and that gasoline not be loaded into delivery vessels unless valid state decals are displayed, assuring the vapor integrity of the gasoline delivery tank 15. Conditions #11, #12, and #15 contain work practice standards pertaining to liquid and vapor leaks, and excess drainage. Compliance with all required testing, monitoring and recordkeeping requirements is assured by conditions #9, #12-14 and #16-19. Condition #9 specifies EPA Method 27 to determine vapor tightness for gasoline delivery vessels. Condition #19 requires annual testing to show compliance with the vapor collection and control system pressure requirements. Conditions #12-14 and #16 require monthly performance and recordkeeping of leak inspections and quarterly drainage inspections with monitoring. Conditions #12, #14, #17, and #18 specify test

<sup>&</sup>lt;sup>15</sup> Section 41962 of the California Health and Safety Code gives authority to CARB to establish performance standards and test procedures to be performed annually for gasoline cargo tanks. The California Code of Regulations, Title 17, subchapter 8, Article 1, section 94004, Certification of Vapor Recovery Systems - Gasoline Cargo Tanks, refers to the CARB's "Certification and Test Procedures for Vapor Recovery Systems of Gasoline Cargo Tanks". This CARB publication contains the applicable test procedures and performance standards, which must be performed/passed to receive a valid state decal assuring gasoline cargo tank integrity (specifically CP-204, TP-204.1, TP-204.2).

methods to be used to demonstrate compliance with permit requirements for vapor leaks, drainage and VOC emissions.

#### Step 4. Certify compliance

By using this template as part of the title V application, the applicant is certifying compliance with all conditions required as part of the template.

### Step 5. Compliance schedule for new monitoring requirements

Not applicable.

#### Step 6. Request for permit shield

By using this template the applicant is requesting a permit shield from the requirements of District Rules 4621, sections 5.1 and 5.2 excluding section 5.2 for railroad car delivery vessels only, 4624, County Rules 412 (Fresno, Kings, Stanislaus, Merced, and San Joaquin), 413 (Kern and Tulare), and 419 (Madera), and subpart XX of 40CFR60. See template conditions #22 - 24.

#### District Rule 2520, 9.1, 9.4.2 and 9.5.2

Section 9.1 requires each permit to include emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance. This template does not address compliance and monitoring for vapor collection and control systems other than systems which return vapors to product storage tanks. Condition #21 prohibits the use of other systems which are not addressed in this template. To assure compliance with leak and delivery vessel pressure requirements, condition #22 prohibits loading of a delivery vessel if its pressure relief valve opens and requires corrective action should this condition occur.

Section 9.4.2 requires that periodic monitoring be performed if none is associated with a given emission limit to assure compliance. Section 5.3 of District Rule 4624 requires pressure of the vapor collection and control system not to exceed certain limits for water column pressure and vacuum. The District rule does not specify a test method or frequency for this work practice standard, which is in support of the most stringent emissions requirement, as demonstrated through streamlining in accordance with White Paper Number 2. White Paper Number 2 also states monitoring, recordkeeping and reporting requirements must be evaluated separately from the most stringent emission limit and associated work practice standards in order to select the requirements which would be most effective or as effective in assuring compliance to the same extent. Therefore, the proposed monitoring, recordkeeping and reporting requirements in condition #19 are identical to 40CFR60.503(d), concerning testing to demonstrate pressure requirements. Section 5.4 of District Rule 4624 requires there shall be no excess organic liquid drainage at disconnect, but does not specify monitoring frequency

or method. Therefore, template conditions have been added which contain monitoring frequencies and test methods (see conditions #13, #14 and #16).

Section 9.5.2 requires all records be maintained for at least five years. Template permit condition #2 requires that all records be maintained for at least five years.

#### V. Permit Shield

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Title V permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

### County Rules 108, 108.1, and 110

By using this template the applicant is requesting a permit shield from requirements of County Rules 108, 108.1, and 110 in template condition #22.

#### District Rule 4621, except sections 5.1 and 5.2

District Rule 4621, except sections 5.1 and 5.2, does not apply any unit qualifying to use this template. These requirements are applicable to gasoline bulk plants which load less than 20,000 gallons per day of gasoline. This template is restricted to units which are gasoline loading racks at facilities which load 20,000 gallons or more in any one day into truck tanks and therefore the requirements District Rule 4621, except sections 5.1 and 5.2, do not apply. A permit shield is granted from these requirements in template permit condition #25.

#### **District Rule 4661**

District Rule 4661 establishes limits on VOC emissions associated with the use of organic solvents. Pursuant to section 4.2 of this rule, any facility that is subject to and in compliance with a source specific prohibitory Rule in District Regulation IV, is exempt from Rule 4661. Units qualifying to use this template are limited to those which are in full compliance with the provisions of District Prohibitory Rule 4624, and are therefore exempt from Rule 4661. A permit shield is granted from this requirement in template permit condition #25.

#### VI. Permit Conditions

The following conditions will be incorporated into the Title V permit of any facility choosing to make use of template SJV-LR-1-0:

1. Operator shall ensure that all required source testing conforms to the compliance testing procedures described in District Rule 1081(as amended December 16, 1993).

[District Rule 1081, and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)]

- 2. Operator shall maintain all records of required monitoring data and support information for inspection for a period of five years. [District Rule 2520, 9.5.2]
- 3. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that TOC emissions do not exceed 0.08 pounds per 1000 gallons of organic liquid with greatest vapor pressure loaded. [40 CFR 60.502(b), District Rules 2520, 9.4.2 and 4624, 5.1.1 and County Rules 412 (Fresno, Kings, Stanislaus, Merced, and San Joaquin), 413 (Kern and Tulare), and 419 (Merced)]
- 4. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624, 5.2 and County Rules 412 (Fresno, Kings, Stanislaus, Merced, and San Joaquin), 413 (Kern and Tulare), and 419 (Merced)]
- 5. The transfer of gasoline from any delivery vessel to any stationary storage container with 250 gallon capacity or more shall not be allowed unless the container is equipped with a permanent submerged fill pipe and an ARB certified Phase I vapor recovery system, which is maintained and operated according to the manufacturers specifications. [District Rule 4621, 5.1.1]
- 6. No gasoline shall be placed, stored, or held in any above-ground tank of 250 gallon capacity or more unless it is equipped with a pressure-vacuum valve set to within 10% of the maximum allowable working pressure of the tank. [District Rule 4621, 5.1.2]
- 7. All delivery tanks which previously contained organic liquids, including gasoline, with a TVP greater than 1.5 psia at loading conditions shall be filled only at Class 1 loading facilities using bottom loading equipment with a vapor collection and control system operating such that VOC emissions do not exceed 0.08 lb/1000 gallons loaded; or Class 2 loading facilities equipped with a system to control at least 95% of VOC displaced; and which operate so the delivery tank does not exceed 18 inches water column pressure nor 6 inches water column vacuum. [District Rules 4621, 5.2.2 and 4624, 5.3, and Kings County Rule 412, 4(a)]
- 8. No gasoline delivery vessel shall be used or operated unless it is vapor tight. No gasoline delivery vessel shall be operated or loaded unless valid State of California decals are displayed on the cargo tank, attesting to the vapor integrity of the tank as verified by annual performance of CARB required Certification and Test Procedures for Vapor Recovery Systems for Cargo Tanks. [District Rule 4621, 5.2.1 & 5.2.2, Health & Safety Code, section 41962, and CCR, Title 17 section 94004]

- 9. The test method to determine vapor tightness of delivery vessels owned or operated by this facility shall be EPA Method 27. [District Rule 4621, 6.2.3 and 40CFR§60.503(c)]
- 10. Construction, reconstruction (as defined in District Rule 4001, amended January 19, 1995), or expansion of any top loading facility shall not be allowed. [District Rule 4624, 5.5]
- 11. Loading and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624, 5.4; and County Rules 412 (Fresno, Kings, Stanislaus, Merced, and San Joaquin), 413 (Kern and Tulare), and 419 (Merced)]
- 12. During the loading of organic liquids, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rule 2520, 9.4.2, 40CFR 60.502 (j)]
- 13. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520, 9.4.2]
- 14. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520, 9.4.2]
- 15. Each detected leak shall be repaired within 15 calendar days of detection. [40CFR 60.502 (j)]

- 16. The permittee shall maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired, reasons for any leak repair interval in excess of 15 days), and E) inspector name and signature. [District Rule 2520, 9.4.2 and 40CFR 60.505 (c)]
- 17. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624, 6.2.1 and County Rules 412 (Fresno, Stanislaus, Merced, and San Joaquin), 413 (Kern, Kings, and Tulare), and 419 (Madera)]
- 18. VOC emissions from the vapor collection and control system shall be determined annually using 40CFR§60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 432, or ARB Method 2-4. [District Rule 4624, 6.2.2 and County Rules 412 (Fresno, Kings, Stanislaus, Merced, and San Joaquin), 413 (Kern and Tulare), and 419 (Merced)]
- 19. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of ±2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520, 9.4.2 and 40CFR60.503(d)]
- 20. The vapor collection and control system shall consist of a device which returns collected vapors to a product storage tank only. The system shall not include a device which incinerates, adsorbs or otherwise treats collected vapors. [District Rule 2520, 9.1]
- 21. Loading of a delivery vessel shall discontinue if its pressure relief valve opens. Corrective action shall be taken should this condition occur. [District Rule 2520, 9.1]
- 22. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), 110 (Madera), 412 (Fresno, Kings, Stanislaus, Merced, and San Joaquin), 413 (Kern and Tulare), and 419 (Madera). A permit shield is granted from these requirements. [District Rule 2520, 13.2]
- 23. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: District Rules 4621(as amended May 20, 1993), sections 5.1 and 5.2 excluding section 5.2 for railroad car delivery vessels only,

and 4624 (as amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2]

- 24. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40CFR60, Subpart XX. A permit shield is granted from these requirements. [District Rule 2520, 13.2]
- 25. The requirements of SJVUAPCD Rules 4621(as amended May 20, 1993), except sections 5.1 and 5.2; and 4661 (as amended December 17, 1992) do not apply to this permit unit. A permit shield is granted from these requirements. [District Rule 2520, 13.2]

## APPENDIX A

## DEFINITIONS FOR TEMPLATE # SJV-LR-1-0

#### 40CFR§60.2 Definitions.

Construction: fabrication, erection, or installation of an affected facility.

*Modification*: any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.

[44 FR 55173, Sept. 25, 1979, as amended at 45 FR 5617, Jan. 23, 1980; 45 FR 85415, Dec., 24, 1980; 54 FR 6662, Feb. 14, 1989; 55 FR 51382, Dec. 13, 1990; 57 FR 32338, July 21, 1992; 59 FR 12427, Mar. 16, 1994]

#### **SJVUAPCD RULE 4624**

Gasoline bulk plant: any loading facility and associated unloading facilities, storage tanks, and vapor recovery system(s) used to load less than 20,000 gallons in any one (1) day of gasoline to delivery vessels (i.e. tanks trucks or trailers). [District Rules 4621, 3.3 and 4624, 3.5]

## **APPENDIX B**

## COUNTY RULE / DISTRICT RULE 1081 COMPARISON FOR TEMPLATE # SJV-LR-1-0

## **APPENDIX B**

## Rule 1081 (Source Sampling)

	1081 SJVUAPCD	108 KINGS	110 MADERA	108.1 FRESNO	108.1 MERCED	108.1 S.J.	108.1 TULARE	108.1 KERN	108.1 STANI SLAUS
REQUIREMENTS									
Upon request of the APCO, the source shall provide info. and records to enable the APCO to determine when a representative sample can be taken.	Х		Х	Х	X	Х	Х	Х	X
The facility shall collect, have collected or allow the APCO to collect, a source sample	X	X	Х	X	Х	Х	X	X	X
The source shall have District personnel present at a source test	Х								
The applicable test method, if not specified in the rule, shall be conducted in accordance with 40 CFR § 60, Appendix A	X								
Test procedures: 1) arithmetic mean of three runs 2) a scheduled source test may not be discontinued solely due to the failure to meet the applicable standard(s), and 3) arithmetic mean of two runs is acceptable if circumstances beyond owner or operator	X								
standard(s), and 3) arithmetic mean of two runs is									

## APPENDIX C

## EPA COMMENTS / DISTRICT RESPONSE FOR TEMPLATE # SJV-LR-1-0

## **EPA COMMENTS / DISTRICT RESPONSE**

The EPA's comments regarding loading rack template SJV-LR-1-0 are encapsulated below followed by the District's response. A copy of the EPA's 5/8/97 letter is available at the District. This template is designed for loading racks at facilities loading greater than 20,000 gallons of gasoline into tank trucks on any one day and at facilities which commenced construction or modification after December 17, 1980.

## **Template Specific Comments:**

#### 1. EPA COMMENT

The streamlining demonstration must address emission limits expressed as a collection efficiency. The streamlining demonstration must also convert all emission limits into common units. The District may use worst-case assumptions if the conversion depends on source specific information.

The District must also document the conversions that are used to convert different emission limits (specifically with reference to "profile codes" used to convert total organic compounds to volatile organic compounds). We would agree that the emission rate in District Rule 4624 (which excludes methane and ethane) is stricter than NSPS for bulk gasoline if the District can demonstrate that no petroleum distillate subject to this template could contain more than 30% exempt compounds.

Finally, the District may replace the NSPS tank tightness requirements with the CARB requirements if it can demonstrate these requirements are stricter and practically enforceable in the permit. The streamlining demonstration must reference the regulation that actually set these performance standards instead of the state law requirements that authorizes CARB to set these standards.

#### DISTRICT RESPONSE

The District has moved the collection efficiency requirements being addressed from the work practice standards category to the emission limit category in the streamlining demonstration. All emission limits have been converted to common units and where necessary, worst case operating assumptions have been made in selecting the most stringent emission limit in the streamlining demonstration.

The District has documented all conversions used to convert different emission limits. The NSPS, subpart XX, emission requirement addressed in the streamlining demonstration applies to gasoline loading only. Gasoline is defined as any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 4.0 psia

which is used for fuel for internal combustion engines. In converting the NSPS emission limit to similar units as District Rule 4624 emission limit units, it is necessary to convert Total Organic Compounds (TOC) to Volatile Organic Compounds (VOC), which excludes methane and ethane. Petroleum distillates, excluding natural gas and liquid petroleum gas, are composed of 100% VOC. We have used this factor in converting TOC to VOC and have restricted use of this template in the Template Qualification Form to units which do not load natural gas or liquid petroleum gas to validate this assumption. In subsequent phone conferences with EPA concerning requirements for TOC versus VOC, it was decided to propose an emission limit of 0.08 lb TOC/1000 gallons loaded instead of VOC, pursuant to District Rule 4624. The District agreed this was reasonable since the assumption was made in the template that for affected sources VOC equals TOC.

Regarding the tank tightness requirements, in subsequent conversations with both EPA and CARB, it was discovered the CARB test methods (authorized by the state Health & Safety Code) used for gasoline delivery cargo tank tightness (TP 204.1 and 204.2) have .not been approved by EPA and therefore cannot be substituted for EPA Method 27, which is specified in both District Rule 4621 and NSPS. EPA White Paper 2, Attachment A states that only EPA approved methods may be used in streamlining as an alternative test method to show compliance with emission limits. Therefore the District has added the following requirement, pursuant to District Rule 4621:

- The test method to determine vapor tightness of delivery vessels owned or operated by this facility shall be EPA Method 27. [District Rule 4621, 6.2.3 and 40CFR§60.503(c)]

#### 2. EPA COMMENT

Regarding the permit shields, the District has shielded the entire "source" from certain requirements. As we noted in our previous comments, the permit shield may only apply to the individual unit subject to the template unless the permit contains all necessary conditions to ensure that a source shielded cannot later trigger these requirements.

#### **DISTRICT RESPONSE**

The applicability of the permit shields has been restricted to apply to the permit unit and not to the entire source. Permit conditions have been added as necessary to ensure that a source shielded from cannot later trigger these requirements

#### 3. EPA COMMENT

Section 5.1 of District Rule 4621 contains general source requirements regarding gasoline storage tanks which could apply to sources subject to this template. Therefore the District must add conditions for gasoline storage tanks to address the requirements of section 5.1.

#### **DISTRICT RESPONSE**

The District agrees section 5.1 requirements could apply generally to a source qualifying to use this template. Conditions have been added to the template to address the requirements of District Rule 4621, section 5.1, as follows:

- The transfer of gasoline from any delivery vessel to any stationary storage container with 250 gallon capacity or more shall not be allowed unless the container is equipped with a permanent submerged fill pipe and an ARB certified Phase I vapor recovery system, which is maintained and operated according to the manufacturers specifications. [District Rule 4621, 5.1.1]
- No gasoline shall be placed, stored, or held in any above-ground tank of 250 gallon capacity or more unless it is equipped with a pressure-vacuum valve set to within 10% of the maximum allowable working pressure of the tank. [District Rule 4621, 5.1.2]

#### 4. EPA COMMENT

The District must add the general source operating restriction for delivery vessels pursuant to District Rule 4621, section 5.2. The template does not restrict the source from loading the delivery vessel at another loading rack not subject to the template. In addition the permit must require that no delivery vessel will be operated or used unless it is vapor tight. While the state requires an annual test, sources are also subject to this on-going requirement.

#### DISTRICT RESPONSE

The following conditions have been amended as follows to include the general source operating restrictions for delivery vessels, including the vapor tightness requirement, pursuant to District Rule 4621, section 5.2:

- All delivery tanks which previously contained organic liquids, including gasoline, with a TVP greater than 1.5 psia at loading conditions shall be filled only at Class 1 loading facilities using bottom loading equipment with a vapor collection and control system operating such that VOC emissions do not exceed 0.08 lb/1000 gallons loaded; or Class 2 loading facilities equipped with a system to control at least 95% of VOC displaced; and which operate so the delivery tank does not exceed 18 inches water column pressure nor 6 inches water column vacuum. [District Rules 4621, 5.2.2 and 4624, 5.3, and Kings County Rule 412, 4(a)]
- No gasoline delivery vessel shall be used or operated unless it is vapor tight. No gasoline delivery vessel shall be operated or loaded unless valid State of California decals are displayed on the cargo tank, attesting to the vapor integrity of the tank as verified by annual performance of CARB required Certification and Test Procedures for Vapor Recovery Systems

for Cargo Tanks. [District Rule 4621, 5.2.1 & 5.2.2, Health & Safety Code, section 41962, and CCR, Title 17 section 94004]

#### 5. EPA COMMENT

Regarding the shield for District Rule 4622, Transfer of Gasoline into Vehicle Fuel Tanks, the permit must either contain a prohibition on operating in a manner that would be subject to rule 4622 or remove the permit shield for this regulation.

#### DISTRICT RESPONSE

The District feels it is obvious that loading racks were not constructed in a manner which would allow them to transfer gasoline directly into vehicle fuel tanks. In addition, units that transfer gasoline into vehicle fuel tanks are prohibited from using this template. The District will not put such a prohibition requirement on the template. We have removed the permit shield from requirements of District Rule 4622 from this permit.

#### 6. EPA COMMENT

Regarding the shield for District Rule 4624, section 5.5, Organic Liquid Loading, the permit shields sources from the prohibition against installing new top loading facilities or expanding existing top loading facilities. This requirement must be added or the shield removed.

#### DISTRICT RESPONSE

This prohibition from District Rule 4624, section 5.5, has been added to the template conditions as follows:

Construction, reconstruction (as defined in District Rule 4001, amended January 19, 1995), or expansion of any top loading facility shall not be allowed. [District Rule 4624, 5.5].

#### 7. EPA COMMENT

Concerning monitoring conditions, we recommend requiring the monthly leak check also include a determination as to whether the source has net the excess drainage limit condition. We also suggest revising condition #6 to require that sources demonstrate that alternate pressure measure devices are equivalent, as follows: "Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other equivalent instrument that is demonstrated to be equivalent..."

#### **DISTRICT RESPONSE**

There is no monitoring frequency specified in applicable regulation or District Rule addressed by this template for excess drainage. In subsequent phone conferences with EPA, the District proposed quarterly inspections for excess drainage, but allowing the source after 5 consecutive negative drainage inspections, the frequency be changed to annual. The District feels that excess drainage at disconnect is readily observable by the operator and affects only the one fitting between the delivery tank and the loading rack and that the proposed requirement would provide adequate monitoring. These drainage requirements are similar to those used for leaks in earlier

approved oil field tank and fugitive leak templates (SJV-TK-1 through 18 and SJV-FG-1, respectively). EPA stated they would not approve this template without the following drainage detection frequency which has been incorporated into the template along with the District proposed inspection method:

- Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage conditions is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520, 9.4.2]
- Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520, 9.4.2]

Condition #6 (now condition #19) has been revised pursuant to EPA's recommendation.

#### 8. EPA COMMENT

We recommend correcting a typographical error in condition #3, as follows: "equipped with a bottom loading and a vapor collection and control system."

We also recommend correcting a typographical error in condition #7, as follows: "detection of organic compounds in excess of 10,000 ppm as methane...."

#### DISTRICT RESPONSE

The District has corrected these two typographical errors as suggested to clarify the meaning of these conditions. Please note however that condition #7 is now #11.

#### 9. EPA COMMENT

The gasoline distribution facility Maximum Control Technology (MACT) standard (40 CFR 63, subpart R) and the refinery MACT (40 CFR 63, subpart CC apply to this source category. We recommend adding these requirements to the "Applicable Requirements" table as category B requirements.

#### DISTRICT RESPONSE

The District agrees both referenced MACT standards may be applicable to sources qualifying to use this template. The gasoline distribution facility and refinery MACTs have been added as category B requirements in the Applicable Requirements table in section III. Category B requirements contain federally enforceable requirements that

were not addressed in the template. Requirements from these rules must be addressed by the applicant outside of the template.

#### 10. EPA COMMENT

Regarding the Template Qualification Form, the certification language is incomplete and must be made consistent with part 70 requirements.

#### DISTRICT RESPONSE

The compliance certification language in the Template Qualification Form has been amended to be consistent with part 70 requirements.

#### 11. EPA COMMENT

During a discussion on June 23, 1997, EPA made a verbal comment requesting the District to add a requirement to both templates LR-1-0 and LR-2-0 for sources to permanently install a pressure guage or magnehelic device on the vapor recovery systems to detect blockages in the system.

#### **DISTRICT RESPONSE**

We are not aware of any significant number of blockages occuring at Title V facilities in our District. Should a blockage occur the pressure in the vapor recovery and control system may elevate resulting in the increase potential for leaks, including leaks due to an open delivery tank pressure relief valve. The District believes the currently proposed monthly leak inspection requirements (changing to quarterly inspections after five consecutive months without a leak) adequately address concerns for leaks. Additionally the delivery vessel is required to be vapor tight and be tested annually. The vapor recovery and control system must be tested annually to insure complinace with collection and emission requirements. However, the District has added the following prohibition to the template conditions, to help insure the vapor recovery system is functioning properly and vapors are not released to atmosphere:

- Loading of a delivery vessel shall discontinue if its pressure relief valve opens. Corrective action shall be taken should this condition occur. [District Rule 2520, 9.1]

# APPENDIX D TEMPLATE QUALIFICATION FORM

FOR TEMPLATE # SJV-LR-1-0

## **Title V General Permit Template Qualification Form**

Yes	No	Description of Qualifying Units						
	- 10	Did construction or modification (see Appendix A) commenced after December 17,						
		1980? [40CFR§60.500] If "yes", continue to next question; otherwise STOP - you						
		cannot use this template.						
		Does the facility receive gasoline by pipeline, ship or barge? [40CFR§60.501] If						
		"yes", continue to next question; otherwise STOP - you cannot use this template.						
		Is the loading rack (unit) located at a facility which loads more than 20,000 gallons or						
		gasoline (defined as any petroleum distillate or petroleum distillate/alcohol blend						
		which is used as a fuel for internal combustion engines) on any one day into gasoline						
		tank trucks? [40CFR§60.501] If "yes", continue to next question; otherwise STOP -						
		you cannot use this template.						
		Is the Reid vapor pressure greater than or equal to 4.0 psia and is the true vapor						
		pressure greater than or equal to 1.5 psia, of gasoline being loaded at actual loading						
		temperature? [40CFR§60.501] If "yes", continue to next question; otherwise STOP -						
		you cannot use this template.						
		Is this unit located at a gasoline bulk plant (see Appendix A) and subject to District						
		Rule 4621 (Gasoline Transfer into Stationary Storage Containers, Gasoline Delivery						
		Vessels and Gasoline Bulk Plants)? [District Rule 4624, 4.2] If "no", continue to nex question; otherwise STOP - you cannot use this template.						
		Is unit used to load natural gas or liquid petroleum gas, as defined by the American						
		Society for Testing and Material in ASTM D1835-82, "Standard Specification for						
		Liquid Petroleum Gases"? If "no", continue to next question; otherwise STOP - you						
		cannot use this template.						
		Does the vapor collection and control system consist of a device which returns						
		collected vapors to a product storage tank only? If "yes", continue to next question;						
		otherwise STOP - you cannot use this template.						
		Is the gasoline being loaded into a vehicle fuel tank? [District Rule 4622, 1.0 and 3.7						
		If "no", continue to next question; otherwise STOP - you cannot use this template.						
		Is the facility currently in full compliance with District Rule 4624? [District Rule 4661						
		exemption, pursuant to section 4.2] If "no", STOP - you cannot use this template;						
		otherwise you qualify to use this template.						
Based or	inform	ation and belief formed after reasonable inquiry: 1) the information on this form is true						
accurate,	and co	mplete, and 2) the facility is in compliance with this template's permit conditions:						